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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 16, 2003

**Ms.** Marlene Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re: RM No. 10687 -- Opposition to ITA Petition

Dear Ms. Dortch:

CSX Transportation ("CSXT) operates the largest rail network in the eastern United States. Based in Jacksonville, FL, CSXT provides rail transportation over more than 23,000 route miles in 23 states, the District of Columbia and two Canadian provinces. In addition, it provides services to customers outside its own rail network through strategic partnerships with shortline and Class 1 railroads in the United States, Canada and Mexico and dispatches passenger rail service in partnership with public transit agencies in the states of Massachusetts, Maryland, Virginia and Florida.

CSXT welcomes the opportunity to respond to the FCC's Public Notice released March 26, 2003, concerning the request of the Industrial Telecommunications Association ("ITA) to become a certified frequency coordinator for railroad mobile radio channels in the United States. CSXT is opposed to the ITA petition.

The railroad industry's mobile radio network is a critical tool for the control, management, security and safety of rail transportation. For over five decades, the Association of American Railroads has performed the frequency coordination function for mobile radio channels for the U.S. railroad industry, and CSXT believes AAR should continue in that role in the future. on an exclusive basis.

CSXT is a member of AAR, and is perfectly satisfied with the frequency coordination service performed by AAR. We have reviewed AAR's opposition filed in this proceeding, and we support it. In particular, we agree with AAR that frequency coordination for railroad channels involves special and unique issues owing to the need for nationwide interoperability among all railroads, and that this

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important function must be performed by persons who are knowledgeable and experienced in railroad operations.

In conclusion, CSXT urges the FCC to deny the ITA petition and to reaffirm that AAR is the sole frequency coordinator for railroad mobile radio channels in the United States.

Sincerely,

Tom Blady

CSX

**AVP Communication Solutions** 

cc: Mr. Jeremy Denton

Industrial Telecommunications Assoc.

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